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March 28, 2012

The Honorable Jocelyn Boyd  
Chief Clerk of the Commission  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: AT&T South Carolina's Petition Requesting the Commission's  
Intervention in Numbering Resources Determinations –  
Charleston Rate Center – United States Department of State  
Docket No.

Dear Ms. Boyd:

BellSouth Telecommunications, LLC d/b/a AT&T South Carolina ("AT&T South Carolina") respectfully encloses for filing a Petition for Review of Numbering Resources Determination in the Charleston Rate Center in the above-captioned matter.

By copy of this letter, I am serving a copy of this document on all parties of record as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Patrick W. Turner". The signature is written in a cursive, flowing style.

Patrick W. Turner

PWT/nml  
Attachment  
1028690

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

In Re: AT&T SOUTH CAROLINA’S )  
PETITION REQUESTING THE COMMISSION’S )  
INTERVENTION IN NUMBERING RESOURCES )  
DETERMINATIONS )  
\_\_\_\_\_ )

PETITION FOR REVIEW OF NUMBERING RESOURCES DETERMINATION  
IN THE CHARLESTON RATE CENTER

In order to meet the numbering needs of the United States Department of State, BellSouth Telecommunications, LLC d/b/a AT&T South Carolina (“AT&T South Carolina”), pursuant to rules adopted by the Federal Communications Commission (“FCC”) for challenging numbering determinations, petitions the Public Service Commission of South Carolina (“Commission”) for review of a recent denial of AT&T South Carolina’s application for use of numbering resources in the 843 area code. Numbering determinations are made by the North American Numbering Plan Administrator (“NANPA”) and/or the Pooling Administrator (“PA”), depending on the nature of the numbering request. The FCC’s rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading “Central office code administration,”<sup>1</sup> and the FCC’s Orders addressing these matters allow for challenges of determinations by both entities.<sup>2</sup> Accordingly, this Petition addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to provide the

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<sup>1</sup> See, e.g., 47 C.F.R. §52.15.

requested relief to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so. The denial that is the subject of this Petition impacts AT&T South Carolina customer the United States Department of State.

In support of this Petition, AT&T South Carolina states:

1. AT&T South Carolina is a telephone utility that provides, among other things, intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Charleston exchange.

2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan (“NANP”).<sup>3</sup>

3. The PA is an independent non-governmental entity that is responsible for administering thousands-block number pooling.<sup>4</sup>

4. On March 31, 2000, the FCC issued an Order relating to numbering resource optimization.<sup>5</sup> The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers.

5. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant’s rate

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<sup>2</sup> See Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, *Numbering Resource Optimization; etc.*, 17 FCC Rcd 252, ¶61 (2001) (“*Third NRO Order*”).

<sup>3</sup> See 47 C.F.R. § 52.13 (a), (b).

<sup>4</sup> See 47 C.F.R. §52.7(g). See also 47 C.F.R. §52.20 (“Thousands-block number pooling is the process by which the 10,000 numbers in a central office code (NXX) are separated into ten sequential blocks of 1,000 numbers each (thousands-blocks), and allocated separately within a rate center.”).

center will be exhausted within six months of the application. The FCC reaffirmed this requirement in two subsequent orders.<sup>6</sup> Prior to this ruling, the Central Office Code Assignment Guidelines used to make code assignments required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center.<sup>7</sup> The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.<sup>8</sup>

7. On or about March 26, 2012, AT&T South Carolina submitted a Pooling Administration System request for the assignment of two thousands-blocks in the Charleston exchange to go with its customer's existing dialing plan. In order to meet the United States Department of State's express request for numbers,<sup>9</sup> AT&T South Carolina requested the

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<sup>5</sup> See Report and Order and Further Notice of Proposed Rule Making, *Numbering Resources Optimization*, 15 FCC Rcd 7574 (2000) ("*First NRO Order*").

<sup>6</sup> See Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, *Numbering Resource Optimization*, 16 FCC Rcd 306 at ¶29 (2000) ("*Second NRO Order*"); *Third NRO Order* at ¶¶48-49.

<sup>7</sup> See *Second NRO Order* at ¶22; *Third NRO Order* at ¶¶50-52.

<sup>8</sup> *Third NRO Order* at ¶¶50-52.

<sup>9</sup> See Exhibit A to this Petition (redacted as appropriate).

assignment of two thousands-blocks in the 843 NPA with NXX's that do not end on 0,1,8 or 9.<sup>10</sup> As AT&T South Carolina does not have the existing numbers to meet the customer's request, AT&T South Carolina is requesting that the numbers be assigned to it.

8. AT&T South Carolina's application was completed in accordance with Industry Numbering Committee ("INC") guidelines, and AT&T South Carolina filled out the necessary Month-to-Exhaust Certification Worksheets as required.

9. At the time of the filing of the numbering resource request, the Charleston Rate Center had a MTE of 112.009 months and 112.769 months for the relevant blocks, and a utilization of 60.441%.<sup>11</sup>

10. Thereafter, also on March 26, 2012, AT&T South Carolina's request was denied because AT&T South Carolina had not met the MTE and/or Utilization criterion now set forth in the INC Guidelines.<sup>12</sup> AT&T South Carolina's numbering resource requests were denied despite the fact that AT&T South Carolina does not have adequate numbering resources needed to satisfy this customer's demands in the Charleston Rate Center.

11. AT&T South Carolina's inability to provide this important customer with the requested numbering resources prevents AT&T South Carolina from providing the quality of service this customer desires, needs, and expects. If AT&T South Carolina is not assigned the numbering resources needed to meet the customer's request, AT&T South Carolina will be unable to provide telecommunications services requested by its customer. The refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's

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<sup>10</sup> See Exhibit B to this Petition.

<sup>11</sup> See *Id.*

<sup>12</sup> See *Id.*

position that “(u)nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources.”<sup>13</sup>

12. Both the FCC’s rules and the INC Guidelines provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources.<sup>14</sup>

13. Prior to the FCC’s Order and the resulting change in the INC Guidelines, the applicable MTE procedures permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider’s inventory did not have a block of sequential numbers large enough to meet the customer’s specific request. Under today’s procedures, numbering determinations are based on the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief “if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.”<sup>15</sup> In addition, the FCC has ruled that, “States...may grant requests for customers seeking contiguous block of numbers.”<sup>16</sup>

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<sup>13</sup> *Second NRO Order* at ¶ 61.

<sup>14</sup> *See Third NRO Order*, Appendix A, Final Rules, § 52.15(g) (4) (“The carrier may challenge the NANPA’s decision to the appropriate state regulatory commission”); *Third NRO Order* at ¶¶ 61-66; *Central Office Code (NXX) Assignment Guidelines*, INC 95-407-009, § 13.0 (rev. April 26, 1999)(CO Code Guidelines) (“Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body”).

<sup>15</sup> *Third NRO Order* at ¶ 64.

<sup>16</sup> *Id.*

14. AT&T South Carolina requests that the Commission reverse the decision to withhold numbering resources from AT&T South Carolina because that decision interferes with AT&T South Carolina's ability to provide telecommunication services to its customers as required under South Carolina law.

15. This Commission (see Docket No. 2002 -185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review numbering denials and to order the release of number resources to AT&T South Carolina to meet customer needs.

**WHEREFORE**, AT&T South Carolina requests that the Commission:

- A. Reverse the decision to deny AT&T South Carolina's request for additional numbering resources;
- B. Direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide assignment of two thousands-blocks in the 843 NPA with NXX's that do not end on 0,1,8 or 9; and
- C. Grant the requested relief as soon as possible.

Respectfully submitted this 28<sup>th</sup> day of March 2012.



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Patrick W. Turner  
Suite 5200  
1600 Williams Street  
Columbia, South Carolina 29201  
(803) 401-2900

ATTORNEY FOR AT&T SOUTH CAROLINA

# EXHIBIT A





United States Department of State  
Washington, D.C. 20520

March 8, 2012

Telecommunications, Wireless and Data Services Division (TWD)  
2025 E Street, N.W. (4<sup>th</sup> Floor)  
Washington, DC 20006

ATTN: Leonard Evans Jr.  
410 N. Cedar Bluff Rd  
Room 300  
Knoxville, TN 37923

**Subject: Request additional Direct Inward Dial (DID) support for the U.S. Department of State**

The Department of State Telecommunications, Wireless, and Data Services Division has an established business relationship with AT&T by means of an existing service account (# [REDACTED]) which provides [REDACTED] service, and [REDACTED] services. This service is being delivered to our facility known as the Charleston Financial Service Center/Passport Center at 1969 Dyess Avenue (Building 646A), Charleston, SC 29408.

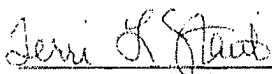
We are requesting a contiguous block of 2,000 new DID numbers to be delivered using existing [REDACTED] ([REDACTED]) and meeting the following DID Restrictions:

1. The new DID range shall not match the last 5-digits (counting right-to-left) of our existing numbers (listed below).

	DID NUMBER RANGE			QTY
01	843-202-3700	thru	3999	0300
02	843-308-5240	thru	5639	0400
03	843-746-0503	thru	0799	0297
04	843-746-1104	thru	1199	0096
05	843-746-1202	thru	1208	0007
06	843-746-1674	thru	1973	0300











2. The 5<sup>th</sup> digit (counting from right to left) shall not be a 0, 1, 8, or 9.
3. The range shall include 843-NN3-5240 thru 843-NN3-5639.
4. The range shall include 843-NN3-5674 thru 843-NN3-5973.

The request due date, for having this service ordered, installed & tested is no later than May 1, 2012.

  
Terri Staub, Division Chief      Date 3/14/2012  
TWD Division  
Department of State

cc: Debora Nagy

# EXHIBIT B

<b>Pooling Administration System</b>	
 <b>MARTA.ANTELO@ATT.COM (SP)</b>	<div style="text-align: right;"><a href="#">Sign Out</a></div> <div style="text-align: center; margin-top: 5px;">Time : 03/26/2012 03:35:52 PM EDT</div> <div style="text-align: right; margin-top: 5px;"><a href="#">Printable Version</a></div>
<div style="margin-bottom: 5px;"> Individual Block Requests</div> <div style="margin-bottom: 5px;"> CO/NXX Code Requests</div> <div style="margin-bottom: 5px;"> Withdraw Pending Requests</div> <div style="margin-bottom: 5px;"> Confirm Resources In Service</div> <div style="margin-bottom: 5px;"> Donate Blocks</div> <div style="margin-bottom: 5px;"> Submit Forecast</div> <div style="margin-bottom: 5px;"> Search Forms</div> <div style="margin-bottom: 5px;"> Reports</div> <div style="margin-bottom: 5px;"> User Profile</div>	<div style="text-align: right; margin-bottom: 20px;">TBPAG Attachment 1 - March 19, 2007</div> <div style="text-align: center; margin-bottom: 20px;"><b>Thousands-Block Application Form - Part 1A</b></div> <div><div style="display: flex; justify-content: space-between;"><div style="width: 30%;">Tracking Number:</div><div style="width: 70%;">843- <b>CHARLESTON-SC-525913</b> <u>Individual Block Request</u></div></div><div style="margin-top: 20px;"><div style="display: flex; justify-content: space-between;"><div style="width: 30%;">Type of Application:</div><div style="width: 70%;"><input checked="" type="checkbox"/> New      <input type="checkbox"/> Change      <input type="checkbox"/> Disconnect</div></div></div></div>
<b>GENERAL APPLICATION INFORMATION</b>	
<b>1.1 Contact Information:</b>  Block Applicant: Company Name: <b>BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL &amp; TEL</b> Headquarters Address: <b>2600 CAMINO RAMON</b> City, State, Zip: <b>SAN RAMON, CA, 94583</b> Contact Name: <b>MARTA ANTELO</b> Contact Address: <b>600 NW 79TH AVENUE, ROOM 336</b> City, State, Zip: <b>MIAMI, FL, 33126</b> Phone: <b>305-260-8213</b> FAX: <b>305-264-2918</b> E-mail: <b>MARTA.ANTELO@ATT.COM</b>  Pooling Administrator: <sup>ii</sup> Contact Name: <b>John Auerbach</b> Contact Address: <b>1800 Sutter St. Ste. 780</b> City, State, Zip: <b>Concord, CA, 94520</b> Phone: <b>925-363-8706</b> FAX: <b>925-363-7684</b> E-mail: <b>john.auerbach@neustar.biz</b>	
<b>1.2 General Information:</b>  Check one : No LRN needed <input checked="" type="checkbox"/> LRN needed <sup>iii</sup> <input type="checkbox"/>  NPA: <u>843</u> LATA: <u>436</u> OCN: <sup>iv</sup> <u>9417</u> Parent Company's OCN <u>9400</u> Number of Thousands-Blocks Requested : <u>2</u>	

Switching Identification(Switch Entity/POI) : <sup>v</sup>  
CHTNSCNO74F

City or Wire Center Name : \_\_\_\_\_

Rate Center: <sup>vi</sup>  
CHARLESTON

Rate Center Sub Zone: \_\_\_\_\_

**1.3 Dates:**

Date of Application: <sup>vii</sup> \_\_\_\_\_  
03/26/2012

Requested Block Effective Date: <sup>viii</sup>  
04/26/2012

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? (See Section 8.6) Yes ☒ No \_\_\_\_\_  
Expedited Explanation: \_\_\_\_\_

**1.4 Type of Service Provider Requesting the Thousands-Block :**

- a) Type of Service Provider : Incumbent Local Exchange Carrier (ILEC)  
(LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for : Wireline
- c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) \_\_\_\_\_  
**REQUESTING 2 BLOCKS IN NPA 843 AND IN THE POOL LIST BLOCKS 843-952-0,1 ARE AVAILABLE AND NON-CONTAMINATED.**
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any \_\_\_\_\_  
**NXX CANNOT END ON 0,1,8 or 9.**
- e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping(the remainder of the blocks will be given to the pool) \_\_\_\_\_

**1.5 Type of Request:**

Initial block for rate center : Yes \_\_\_\_\_ If Yes , attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes ☒ If Yes , attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change(Mark all that apply)

☐ OCN:Intra-company <sup>ix</sup> ☐ Switching Id ☐ Part 1B

☐ OCN:Inter-company <sup>x</sup> ☐ Effective Date

Change block : Yes \_\_\_\_\_ If Yes , list NPA-NXX-X \_\_\_\_\_

**1.6 Block Return :**

- a) Is this block Contaminated Yes \_\_\_\_\_ No \_\_\_\_\_
- b) If Yes how many TNs are NOT available for assignment : \_\_\_\_\_
- c) Have all new Intra SP ports been completed in the NPAC Yes \_\_\_\_\_ No \_\_\_\_\_

d) Has this block been protected from further assignment Yes \_\_\_\_\_ No \_\_\_\_\_

Disconnect block : Yes \_\_\_\_\_ If Yes , list NPA-NXX-X \_\_\_\_\_

Remarks: **REQUESTING 2 BLOCKS IN NPA 843 AND IN THE POOL LIST  
BLOCKS 843-952-0,1 ARE AVAILABLE AND NON-CONTAMINATED.**

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.

**MARTA ANTELO**

Signature of Block Applicant

**ASSOC  
TECH  
SUPPORT 03/26/2012  
ANLYS  
NTWK**

Title Date

**Instructions for filling out each Section of the Part 1A form:**

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia<sup>TM</sup> LERG<sup>TM</sup> Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia<sup>TM</sup> Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI<sup>TM</sup> tandem of the facilities based provider<sup>xi</sup>. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-

block applicant certifies veracity of this form by signing their name, and providing their title and date.

**Foot Notes :**

- i Identify the type of change(s) in Section 1.5.
- ii The Pool Administrator is available to assist in completing these forms.
- iii A CO Code application will also need to be submitted to the PA.
- iv Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).
- v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POL.
- vi Rate Center name must be a tariffed Rate Center.
- vii Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.
- viii Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).
- ix Select if you are the current Block Holder.
- x Select if you are not the current Block Holder
- xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

[Back](#)

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Pooling Administration System																																																			
MARTA.ANTELO@ATT.COM (SP)	Sign Out																																																		
Time : 03/26/2012 03:37:42 PM EDT																																																			
<div style="display: flex; flex-direction: column; gap: 5px;"> <div> Individual Block Requests</div> <div> CO/NXX Code Requests</div> <div> Withdraw Pending Requests</div> <div> Confirm Resources In Service</div> <div> Donate Blocks</div> <div> Submit Forecast</div> <div> Search Forms</div> <div> Reports</div> <div> User Profile</div> </div>	<div style="display: flex; justify-content: space-between;"> <div> <p>Appendix 3</p> <p><b>MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup></b> (Thousands-Block Number Pooling Growth Block Request)</p> </div> <div style="text-align: right;"> <p>Printable Version May 16, 2008</p> </div> </div> <div style="margin-top: 10px;"> <p>Tracking Number: <b>843-CHARLESTON-SC-525913</b></p> <p>Date: <b>03/26/2012</b>      OCN: <b>9417</b>      Company Name: <b>BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL &amp; TEL</b></p> <p>Rate Center: <b>CHARLESTON</b></p> <p>List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):</p> <p>Name of Block Applicant: <b>MARTA ANTELO</b>      Signature: <b>MARTA ANTELO</b></p> <p>Title: <b>ASSOC TECH SUPPORT ANLYS NTWK</b>      Telephone No.: <b>305-260-8213</b></p> <p>FAX No.: <b>305-264-2918</b></p> <p>E-mail: <b>MARTA.ANTELO@ATT.COM</b></p> <p>A. Available Numbers: <b>147441</b></p> <p>B. Assigned Numbers: <b>297790</b></p> <p>C. Total Numbering Resources: <b>492696</b></p> <p>D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation <sup>2</sup>: <b>0</b></p> <p>List Excluded Code(s) or Block(s):</p> <table style="width: 100%; text-align: center; margin-top: 10px;"> <thead> <tr> <th></th> <th>Month #1</th> <th>Month #2</th> <th>Month #3</th> <th>Month #4</th> <th>Month #5</th> <th>Month #6</th> <th>Month #7</th> <th>Month #8</th> <th>Month #9</th> <th>Month #10</th> <th>Month #11</th> <th>Month #12</th> </tr> </thead> <tbody> <tr> <td>E. Growth History - Previous 6 months<sup>3</sup></td> <td><b>1597</b></td> <td><b>970</b></td> <td><b>-516</b></td> <td><b>1415</b></td> <td><b>1075</b></td> <td><b>1357</b></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>F. Forecast - Next 12 months<sup>4</sup></td> <td><b>983</b></td> <td><b>2983</b></td> <td><b>983</b></td> <td><b>983</b></td> <td><b>983</b></td> <td><b>983</b></td> <td><b>983</b></td> <td><b>983</b></td> <td><b>983</b></td> <td><b>983</b></td> <td><b>983</b></td> <td><b>983</b></td> </tr> </tbody> </table> </div>													Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12	E. Growth History - Previous 6 months <sup>3</sup>	<b>1597</b>	<b>970</b>	<b>-516</b>	<b>1415</b>	<b>1075</b>	<b>1357</b>							F. Forecast - Next 12 months <sup>4</sup>	<b>983</b>	<b>2983</b>	<b>983</b>	<b>983</b>	<b>983</b>	<b>983</b>	<b>983</b>	<b>983</b>	<b>983</b>	<b>983</b>	<b>983</b>	<b>983</b>
	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12																																							
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G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): **1316.333**

H. Months  
to  
Exhaust<sup>5</sup>  
=

Numbers Available for Assignment to  
Customers(A)

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	147441	112.009
2	148441	112.769

I.  
Utilization<sup>6</sup> Assigned Numbers(B) - Excluded Numbers(D) X 100 =  
= **60.441**

Total Numbering Resources(C)-Excluded  
Numbers(D)

Explanation: \_\_\_\_\_

<sup>1</sup>A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

<sup>2</sup>Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

<sup>3</sup>Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

<sup>4</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>5</sup>To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).










<sup>6</sup>Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))











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Pooling Administration System	
MARTA.ANTELO@ATT.COM (SP) <span style="float: right;">• Sign Out</span>	
Time : 03/26/2012 03:25:42 PM EDT	
<ul style="list-style-type: none"><li> Individual Block Requests</li><li> CO/NXX Code Requests</li><li> Withdraw Pending Requests</li><li> Confirm Resources In Service</li><li> Donate Blocks</li><li> Submit Forecast</li><li> Search Forms</li><li> Reports</li><li> User Profile</li></ul>	<h3>Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)<sup>1</sup></h3> <p>Your Utilization calculates to <b>60.441%</b>. The FCC required the utilization of <b>75.000%</b>. You have requested more blocks than you will exhaust in six months.</p> <p style="text-align: center;"><b>Select One Option and Submit</b></p> <p><input checked="" type="radio"/> Return to the Months To Exhaust Form</p> <p><input type="radio"/> Need to request a State Waiver</p> <p><input type="radio"/> Received a State Waiver</p> <p style="text-align: center;"><input type="button" value="Submit"/> <input type="button" value="Cancel"/></p>
<div style="display: flex; justify-content: space-between;"><div>neustar</div><div>Question? Email us © 1997-2012 Neustar, Inc. <a href="#">Legal Notice</a></div></div>	

Pooling Administration System		
 MARTA.ANTELO@ATT.COM (SP) <span style="float: right;">• Sign Out</span>		
Time : 03/26/2012 03:38:33 PM EDT		
<div> Individual Block Requests</div> <div> CO/NXX Code Requests</div> <div> Withdraw Pending Requests</div> <div> Confirm Resources In Service</div> <div> Donate Blocks</div> <div> Submit Forecast</div> <div> Search Forms</div> <div> Reports</div> <div> User Profile</div>	<div>November 21, 2003 ATIS-0300066.at3</div> <div style="text-align: right;">Printable Version Attachment 3</div> <div style="text-align: center;"><b>Pooling Administrator's Response/Confirmation</b> TBPAAG Part 3</div> <div>Tracking Number : <u>843-CHARLESTON-SC-525913</u></div> <div>Date of Application: <u>03/26/2012</u> Effective Date: _____</div> <div>Date of Receipt: <u>03/26/2012</u> Date of Response: <u>03/26/2012</u></div> <div>Service Provider Name: <u>BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL &amp; TEL</u></div> <div>(Telcordia™ LERG™ Routing Guide) OCN: <u>9417</u></div> <div>NPAC SOA SPID : _____</div> <div>Pooling Administrator Contact Information:</div> <div>John Auerbach Phone: <u>925-363-8706</u></div> <div>Signature of Pooling Administrator</div> <div>John Auerbach Fax: <u>925-363-7684</u></div> <div>Name (print)</div> <div>Email: <u>john.auerbach@neustar.biz</u></div> <div>NPA-NXX or NPA-NXX-X : _____</div> <div>Block Assigned: _____</div> <div>Block Reserved : _____</div> <div>Block Reservation Expiration Date : _____</div> <div>Block/Code Modified : _____</div> <div>Block/Code Disconnected : _____</div> <div>Block Contaminated(Yes or No) : _____</div> <div>If Yes,enter the number of TNs contaminated : _____</div> <div>Switch Identification(Switch Entity/POI): <sup>1</sup> <u>CHTNSCNO74F</u></div> <div>Rate Center: <u>CHARLESTON</u></div> <div>Rate Center Sub Zone: _____</div>	

☒ Form Complete, request denied.

Explanation:

**DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.**

☐ Request withdrawn.

Explanation:

☐ Assignment activity suspended by the administrator.

Explanation:

Remarks:

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI<sup>TM</sup> Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

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STATE OF SOUTH CAROLINA                    )  
  )        **CERTIFICATE OF SERVICE**  
COUNTY OF RICHLAND                        )

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for SBC Internet Services, Inc. d/b/a AT&T Internet Services (“ATTIS”) and that she has caused AT&T South Carolina’s Petition for Review of Numbering Resources Determination in the Charleston Rate Center to be served by the method indicated below upon the following this March 28, 2012:

Thomas C. Foley  
Sr. NPA Relief Planner – Eastern Region NANPA  
NeuStar – NANPA  
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Longwood, FL 32779-2327  
**(Electronic Mail)**

Ms. Kimberly Miller  
Regulatory Policy Attorney  
NeuStar-NANPA  
2000 M Street, NW, Suite 600  
Washington, DC 20036-3328  
**(Electronic Mail)**

Wayne Milby  
Sr. NPA Relief Planner  
NueStar-NANPA  
8385 Yahley Mill Rd.  
Richmond, VA 23231  
**(Electronic Mail)**

Mr. John Manning  
Director  
NANPA Regional Offices  
46000 Center Oak Plaza  
Sterling, VA 20166  
**(Electronic Mail)**

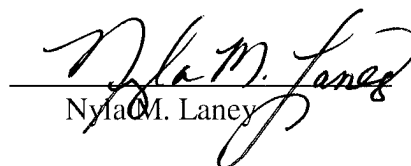
Ms. Amy Putnam  
Director-Neustar National Pooling Administrator  
1800 Sutter Street  
Suite 780  
Concord, CA 94520  
**(Electronic Mail)**

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Jocelyn G. Boyd, Esquire  
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Nyla M. Laney